

1. Regarding the ARRL's petition for rulemaking, RM-10867, I offer the following comments:

Background and Experience

2. I am an extra Class Amateur Radio licensee, and was first licensed as a Novice in 1975. I rose through the ranks of the Commission's Incentive Licensing program, becoming a General Class licensee in 1976 and earned the Extra Class license in 1996. I have been very active in CW and digital modes, as well as HF SSB and VHF and UHF FM voice communications. I am also an emergency volunteer through ARES and RACES in Texas and Virginia, and volunteered for communications support at the Alexandria EOC when the hurricane emergency hit our area in September 2003.

3. I have a great amount of experience with license examinations and in bringing newcomers, especially children and teenagers, into the Amateur Radio Service: I teach licensing classes to children and adults for the Alexandria Radio Club here in the Washington, DC area and have been a licensing instructor for almost 30 years. Every year, I have put together several demonstrations of amateur radio for young people. I am a volunteer examiner in the ARRL-VEC program (1997-present) and used to be very active in the W5YI-VEC program (1997-1999).

Comments on RM-10867

4. Except for the following items, I support the ARRL petition.

5. New Entry-Level License. I OPPOSE a new entry level license as proposed by ARRL. Their proposal is for a license class that is less technical even than the Novice licensing requirements, yet provides broader privileges than even the current Technician Plus license.

a. I propose a simpler solution: Simply combine the Novice, Technician, and Technician Plus into the Technician license, and provide the same privileges as the current Technician Plus license.

b. In other words, do not provide any additional HF voice privileges for an entry class license. As has been seen with the codeless Technician license beginning in 1990 and under Novice Enhancement around 1989, expanding the HF voice privileges and easing written and CW exams is actually an impediment to upgrading.

c. As a result, since it was so easy to obtain a Technician license and the privileges were so great already, licensees often languished in the Technician or Technician Plus class for years without feeling enough incentive to upgrade. So,

that old approach reduces the effectiveness of a very powerful incentive for upgrade: the HF voice privileges.

d. I urge the Commission not to repeat this mistake again. Retain HF voice privileges as an incentive. Do not "give them away" too cheaply.

6. General Principles and Instant Upgrades. While the concept of "no loss in privileges" is admirable, the Commission has fallen to that side of the line over and over for the past 15 years. The cumulative effect is that privileges have increased for the lowest license classes, and entry requirements have decreased. I urge the Commission to take a more balanced approach, as I discuss below.

7. Technician Class Instant Upgrade. I OPPOSE upgrading Technician and Technician Plus licensees to General Class without taking the General written exam.

a. In 1989, 1990, and 2000, the Commission repeatedly lowered entry requirements and/or increase privileges. However, if the Commission follows the ARRL's proposal, it would be the first time that wholesale instant upgrades would be granted. As a result, whatever remnants there are from licensing incentives will be diminished further.

b. Instead, I suggested above, the Technician class should be the new "entry-level" license and provided no more than the existing Technician Plus privileges.

8. Novice Class Instant Upgrade.

a. While I oppose instant upgrade for Novice on principle, as a practical matter there are very few Novices still on the air.

b. Instead of the ARRL's proposal, I recommend that the current Novices be provided Technician Plus privileges, but that the Novice license be made non-renewable. The current few Novice licensees that are still active should be required to upgrade to Technician Class prior to the end of the 2-year grace period after expiration of their license.

9. Advanced Class Instant Upgrade.

a. I OPPOSE instant upgrade to Extra Class for the Advanced Class licensees.

b. If the Commission wishes to eliminate the Advanced Class license, then I propose that prior renewal the Advanced Class licensee be required to pass the Extra Class written exam prior to renewal. Upon renewal, Advanced Class licensees who have not upgraded would become General Class licensees.

c. If there is concern that the Advanced Class licensees would lose privileges, in response I would say that it is up to the licensee. The path to upgrade is a single written exam, where all the questions, answers, and distractor answers are known and published.

10.. Certainly it is not too much to ask that the Amateur Service upgrade its skills after 15 years of decreased skills testing and increasing privileges.

Please consider these modifications to the ARRL proposal.

Sincerely,

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